

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
DIVISION

Heleanka B. Jones

PLAINTIFF

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U.S. DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA

v. ABC Board
Orlando Ball
Rodney Bibb
ABC Board

DEFENDANT

CASE ACTION NO.: 2:24-cv-00506-MHT-CWB

JURY DEMAND (MARK ONE)

☐ YES

☐ NO

EEOC COMPLAINT

1. Plaintiff resides at 50 Boykin Lakes Loop Pike Rd AL 36064

2. Defendant(s)' name(s) Orlando Ball, Rodney Bibb
Montgomery, AL

Location of principal office(s) of the named defendant(s) ABC Board

Nature of defendant(s)' business State of Alabama ABC Board

Approximate number of individuals employed by defendant(s) _____

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 §2000e-5(g).

4. The acts complained of in this suit concern:

1. ☐ Failure to employ me.
2. ☐ Termination of my employment.
3. ☐ Failure to promote me.
4. ☒ Other acts as specified below:

Discrimination, hostile work environment, bullying harassment.

5. Plaintiff is:

- A. ☒ Presently employed by the defendant.
☐ Not presently employed by the defendant. The dates of employment were _____
 Employment was terminated because: _____

- (1) _____ Plaintiff was discharged.
 (2) _____ Plaintiff was laid off.
 (3) _____ Plaintiff left job voluntarily.

6. Defendant(s)' conduct is discriminatory with respect to the following:

- A. ☒ My race.
 B. _____ My religion.
 C. ☒ My sex.
 D. _____ My national origin.
 E. _____ Other, as specified below: _____

7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is (are) Orlando Ball - Warehouse manager
Rodney Bibb - Superintendent supervisor of warehouse departments

8. The alleged discrimination occurred on or about 10/23

9. The nature of my complaint, i.e., the manner in which the individual(s) named above discriminated against me in terms of the conditions of my employment, is as follows:

The nature of my complaint is Orlando Ball has demoted me to a lower position, harrasses me, bullymg intimidates me and has retaliated against me. ~~The work load~~ Discriminated against me being and older Black women. The work load I was doing is All purchase Order, Inventory. When I notice discrepancy or bring to his and Rodney Bibb attention. I was subject to being talked to in a threatening manner, belittled & yelled at. Was not properly trained. I trained myself. I was told to train other employee's with lesser skills & knowledge. Orlando Ball gave the employee the job I was doing. And put me in the warehouse bottle room. That was the job the employee was currently working. The environment is hostile and I was used to train others and was given the job was given to others with lesser skills. So he could continue with the illegal activities.

10. The alleged illegal activity took place at ABC Board montgomery AL

11. I filed charges with the Equal Employment Opportunity Commission regarding defendant(s) alleged discriminatory conduct on or about 12/23 or 1-24.
I have attached a copy of the Notice-of-Right-to-Sue letter issued by the Equal Employment Opportunity Commission. The letter was received by me on _____.

12. I seek the following relief:

- A. ☒ Recovery of back pay.
B. ☒ Reinstatement to my former job, and any other relief as may be appropriate, including injunctive orders, damages, costs, and attorneys fees.

Date: 8/12/24

Harlan S. Jones
Signature of Plaintiff

80 Baykin Lakes Loop
Dike Rd AL 36064
334 451-1125
Address & Telephone Number of Plaintiff